

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

No. 3:23-md-03084-CRB

**[PROPOSED] ORDER GRANTING
PLAINTIFFS' MOTION TO ENFORCE
PTO NO. 2 AND TO COMPEL
DEFENDANTS TO PRODUCE
LITIGATION HOLD AND
PRESERVATION INFORMATION**

This Document Relates to:

Judge: Honorable Charles R. Breyer
Date: January 19, 2024
Time: 10:00 AM
Courtroom: 6 – 17th Floor (by Zoom)

All Cases

Before the Court is Plaintiffs' Motion to Enforce PTO No. 2 and to compel Defendants Uber Technologies, Inc., Rasier, LLC, and Rasier-CA, LLC (collectively "Uber") to produce litigation hold and preservation information. Having considered the motion, the Court rules as follows:

For the reasons stated therein, it is hereby ORDERED that Plaintiffs' Motion is GRANTED.

Within 7 days of this Order, Defendants must produce to Plaintiffs the basic details of their litigation holds, including what litigation or claim the holds relate to, the dates of issue, the dates of preserved ESI, and the names, job titles, and dates of employment of the recipients of the

hold notices.

Within 7 days of this Order, Defendants must produce to Plaintiffs information as to the ESI Sources (custodial and non-custodial) enumerated in PTO No. 2, Paragraph 3, including (1) whether each source was preserved; (2) when it was preserved; when it was used, (2) what it was used for, (3) the general types of information housed, and (4) which Uber employees used or had access to the source.

Within 3 days of this Order, Defendants must confirm to Plaintiffs and the Court that all data sources have been preserved.

Defendants must also immediately suspend the policies referenced under seal in the motion and certify compliance to Plaintiffs and the Court within 3 days.

IT IS SO ORDERED.

DATED this _____ day of _____, 2023

HON. CHARLES R. BREYER
United States District Judge